



Rohde & Schwarz USA, Inc
Erik Balladares
Director of Broadcast & Media Division
6821 Benjamin Franklin Drive
Columbia, MD, 21046
Email: erik.balladares@rsa.rohde-schwarz.com
Office: 818-846-3600 x1402
Mobile: 818-731-5513

Re: MEDIA BUREAU SEEKS COMMENT ON UPDATES TO CATALOG OF
REIMBURSEMENT EXPENSES
MB Docket No. 16-306 and GN Docket No. 12-268
November 15, 2016

Introduction

The Rohde & Schwarz electronics group is a leading supplier of solutions in the fields of test and measurement, broadcasting, secure communications, and radiomonitoring and radiolocation. Founded 80 years ago, this independent global company has an extensive sales network and is present in more than 70 countries. It has around 10,000 employees in over 70 offices worldwide. Rohde & Schwarz serves the North American market with Headquarter in Columbia, MD, and office in Burbank, CA, Dallas, TX, Miami, FL, Beaverton, OR and Ottawa, ON (Canada).

Rohde & Schwarz is the world leader manufacturer for TV Transmitters with an extensive factory capability in Teisnach (Germany). Leading the High Efficiency revolution since 2012 Rohde & Schwarz America has been replacing inefficient IOT tube transmitter with Solid State High power Transmitter with a successful track history.

Comment on production Capacity

Rohde & Schwarz does not anticipate problems manufacturing new transmitters for the repack if the process of ordering equipment is orderly and broadcast stations order equipment as early as possible. Rohde & Schwarz factory capability is second to none, with excess of 800 Liquid cooled transmitters per year, plus 250 Air cooled and several hundred low power transmitter. Due to manufacturing of >90% in house, with proper forecasting and the ability to increase the number of manufacturing shifts from 1 to 2 per day, the capacity limit can be adjusted to meet the USA market requirements for new transmitter replacement and auxiliary equipment for a fast transition to a new channel. We concur with FCC statement in the DA-16-1095A1 that "Transmitter manufacturing....will not affect the time required for a station to complete its transition"



ROHDE & SCHWARZ

Comment on Liquid cooled UHF solid state transmitter

Rohde & Schwarz would recommend adding Liquid cooled transmitter starting from 2.5 kW and not from 4.9 kW. Products in that power class are available and the liquid cooled technology, in many cases, is the most suitable.

Comment on Cost per New Transmitter

Cost per New Transmitter, as described in the October 2016 Widelity Catalog, includes installation, mask filter and proof of performance testing.

The Installation price can vary significantly for each installation based on transmitter site, location, and requirements.

A site survey is advisable whenever possible, since gathering all the proper site requirements up front can in many cases reduce the installation time for the new transmitter.

System dummy load and Switch should be included when necessary in the Cost per New Transmitter. It will allow for testing of new transmitter while completing the antenna related work. It cannot be assumed that the existing station load can be reused when converting from IOT to Solid State transmitter.

Project Management should be considered as a reimbursable cost when time is of the essence in a given transmitter site. It will help coordinate with all parties involved, reducing the overall transition time.

Conclusion

Rohde & Schwarz appreciates the opportunity to submit these Comments and asks the Commission to separate Installation cost as done per Electrical, and add new sections for Site Survey, System Dummy Load, Switch and Project Management for turn-key solution.

Respectfully submitted this November 15th, 2016

Erik Balladares, Director of Broadcast & Media Division

Rohde & Schwarz USA, Inc.